

## REMARKS

Reconsideration of this application as amended is respectfully requested.

In the Office Action, claims 1-22 were pending and rejected. Drawings were objected.

In this response, no claim has been canceled. Claims 1, 8, 12, and 16 have been amended. In addition, new claims 23-27 have been added. Thus, claims 1-27 remain pending. No new matter has been added.

Drawings have been objected. Formal drawings have been submitted herein. The Examiner stated that the claimed method is not shown in the drawings. Applicant respectfully submits that the present invention as claimed is fully supported throughout the specification and drawings. Additional drawing reflecting the claimed method will be submitted as needed when the present application is in condition of allowance.

Claims 1-5, 8-11, and 12-15 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. 6,031,940 of Chui et al. ("Chui"). Claims 16-17 and 20-22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chui. Claims 6-7 and 18-19 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chui in view of article, entitled "Blocking artifact reduction in JPEG-coded images" of Chae et al. ("Chae").

In view of the foregoing amendments, it is respectfully submitted that claims 1-27 include limitations that are not disclosed by Chui. Specifically, independent claim 1 as amended recites as follows:

1. A method comprising:  
encoding a first coefficient value in a first region of a first frame of a motion sequence;

subsequently setting a second coefficient in a second region of a second frame of the motion sequence and in substantially the same position as the first region of the first frame to be within a predetermined closeness with the value of the first coefficient; and setting at least a portion of remaining regions other than the second region of the second frames with values different than a corresponding portion of the first frame.

(Emphasis added)

Independent claim 1 includes limitations of setting a region of a previous frame a first coefficient and setting a corresponding region of a subsequent frame that is in substantially the same location of the corresponding region of the previous frame to a second coefficient close to the first coefficient, while at least a portion of the rest of regions of the second frame is encoded having values different than the corresponding ones in the previous frame. It is respectfully submitted that these limitations are absent from Chui.

Rather, Chui is related to improving encoding efficiency by avoiding encoding video frames that differ little from a prior frame. Particularly, if an upper left portion 140 of the transform coefficient array 102 from one frame to the next fall within a narrow range, the current frame will not need to be coded (see, col. 7, lines 17-28 of Chui). That is, once it is determined that a portion of the current frame is similar to the prior frame, the encoding of the entire current frame will be skipped.

In contrast, the present invention as claimed includes setting a portion of a current frame to a value similar to the one of a corresponding portion of a previous frame (but not necessarily the immediately preceding frame as recited in claim 24, where consecutive frames are required by Chui) that is located substantially the same location, while the rest of the frame is encoded as usual. As a result, certain flickers between the current frame and the previous frame may be reduced while the encoding efficiency and/or the transmit rate may be improved. It is respectfully submitted the above discussed limitations are absent from Chui. It is respectfully

submitted that the above limitations are also absent from Chae. Therefore, independent claim 1 is not anticipated by Chui and is patentable over Chui in view of Chae.

Similarly, independent claims 8, 12, and 16 include limitations similar to those recited in claim 1. Thus, for the reasons similar to those discussed above, independent claims 8, 12, and 16 are patentable over and are not anticipated by Chui in view of Chae.

Given that the rest of the claims depend from one of the above independent claims, at least for the reasons similar to those discussed above, it is respectfully submitted that the rest of the claims are patentable over and are not anticipated by Chui in view of Chae. Withdrawal of the rejections is respectfully requested.

In view of the foregoing, Applicant respectfully submits the present application is now in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned attorney at (408) 720-8300.

Please charge Deposit Account No. 02-2666 for any shortage of fees in connection with this response.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

Date:

9/7/04



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